

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DAVID LIEBLER, and GREG CAREY,  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

LG ELECTRONICS U.S.A., INC., a  
Delaware corporation,

*Defendant.*

Case No. 14-CV-03500-JLL-JAD

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the annexed Plaintiffs' Motion for Leave to File Second Amended Complaint, dated October 31, 2014, Plaintiff will move this Court before the Honorable Jose Linares, U.S.D.J. at the United States Courthouse located at 50 Walnut Street, Newark, New Jersey, on December 15, 2014 at 10:00am, or as soon thereafter as counsel may be heard, for an order, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiffs leave to file their Second Amended Complaint and any other relief that this Court deems reasonable and just.

Respectfully submitted,

**DAVID LIEBLER and GREG CAREY,**  
individually and on behalf of all others similarly  
situated,

Dated: October 31, 2014

By: /s/ Stefan L. Coleman  
One of Plaintiffs' Attorneys

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\*Admitted *Pro hac vice*

*Attorneys for Plaintiffs and the Putative Class*

**CERTIFICATE OF SERVICE**

I, Stefan Coleman, an attorney, hereby certify that on October 31, 2014, I caused the foregoing to be filed by the Court's CM/ECF system and to be served on all counsel of record.

/s/ Stefan L. Coleman